

FY2007 Annual Program Performance Measures

DEPARTMENT: MICHIGAN DEPARTMENT OF LABOR AND ECONOMIC GROWTH

APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

TIMELINE: October 1, 2006 through September 30, 2007

PROGRAM MISSION STATEMENT

The mission of the Michigan Occupational Safety and Health Administration (MIOSHA) is to help assure the safety and health of Michigan workers.

PROGRAM STATEMENT

MIOSHA consists of the five divisions listed below.

The **Appeals Division** represents the General Industry Safety & Health and the Construction Safety & Health Divisions in prehearing conferences and formal administrative hearings related to contested MIOSHA citations.

The **Construction Safety and Health Division** is one of two standards enforcement divisions of MIOSHA. The division enforces safety and health standards in the construction industry.

The **Consultation Education & Training (CET) Division** services are provided throughout the state by an in-house staff of professional occupational safety consultants, occupational safety specialists and industrial hygienists. CET Division personnel are non-enforcement.

The **General Industry Safety & Health Division** is one of two standards enforcement divisions of MIOSHA. The division enforces general industry safety and health standards.

The **Management and Technical Services Division** provides administrative, management, analytical, informational, and technical services to MIOSHA Staff, external clients and to the public.

FUND SOURCE:

Federal Funds

State Restricted Funds

LEGAL BASIS:

Public Act 154 of 1974, as amended

CUSTOMER IDENTIFICATION

Customers – Employers and employees in manufacturing, construction and other workplaces experiencing high injury and illness rates, employee/employer associations and organizations, other employers and employees requesting services, other state and local agencies, and MIOSHA staff.

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CRITICAL GOALS/MAJOR OBJECTIVES

Program Goals

GOAL 1

Improve workplace safety and health for all workers, as evidenced by fewer hazards, reduced exposures, and fewer injuries, illnesses and fatalities.

Overall Goal Status: ■ **Green** - The objective/goal will be completed by the projected date or is complete. If an objective is completed please indicate in the comments section.

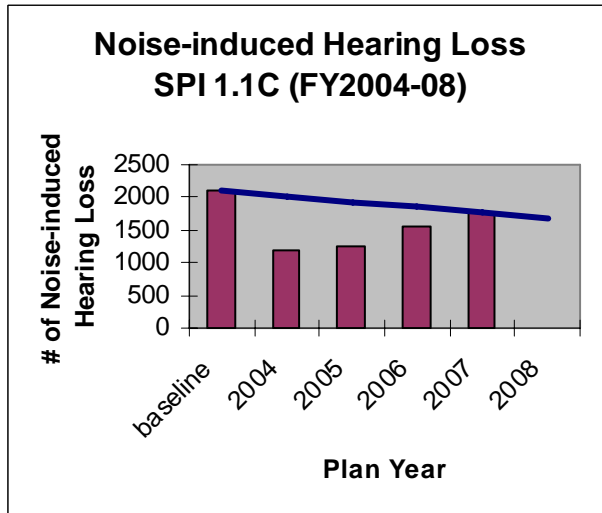
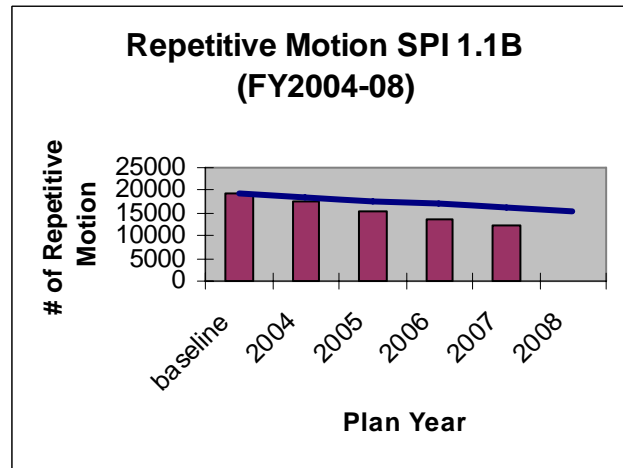
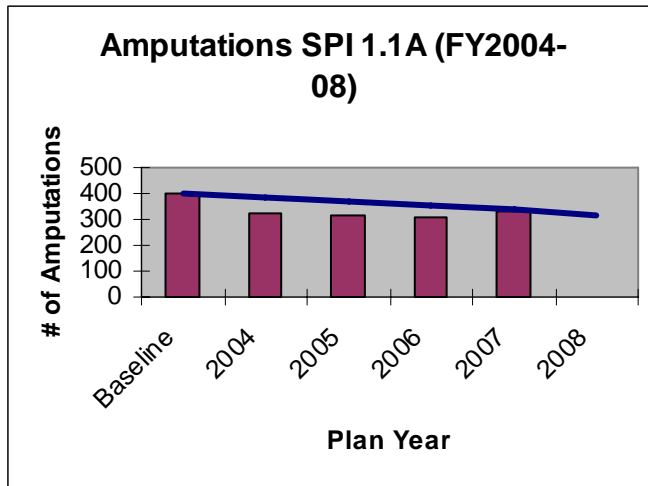
- 1.1 - Reduce by an additional four percent each year the number of worker injuries, illnesses and fatalities by focusing attention and resources on three of the most prevalent types of workplace injuries and illnesses including 1.1A Amputations, 1.1B Overexertion and Repetitive Motion related injuries and illnesses, and 1.1C Noise-Induced Hearing Loss/Standard Threshold Shift related illnesses.

<u>Highlight status</u>	<u>Strategy</u>			
■ Green	1.1			
		1.1A	1.1B	1.1C
	Enforcement inspections	938	55	881
	Seminars & workshops	733	71	63
	Consultations	547	160	242
	Baseline Injuries/Illnesses	399 a	19,234 a	2,099
	4th Year Target	335 a	16,157 a	1,763
	4th Year Achievement	333 a	12,197 a	1,769
	Met Goal?	Yes	Yes	No
	a. Based on three-year rolling average			

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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

- 1.2 - Reduce by an additional four percent each year the number of worker injuries, illnesses, and fatalities by focusing attention and resources on five Michigan high hazard industries including the 1.2A Furniture and Fixtures, 1.2B Primary Metal, 1.2C Fabricated Metal Products, 1.2D Industrial Machines and Equipment, and 1.2E Transportation Equipment.

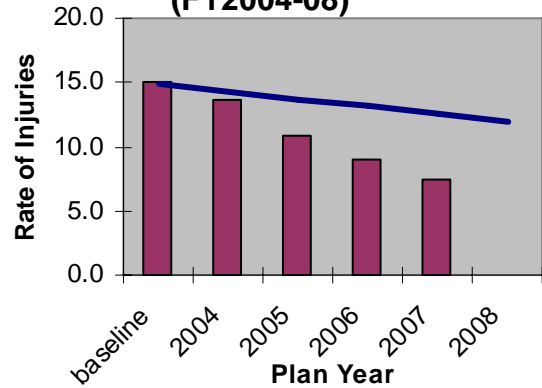
<u>Highlight status</u>	<u>Strategy</u>									
 Green	1.2									
		1.2A		1.2B		1.2C		1.2D		1.2E
	Enforcement Inspections	33		81		323		288		162
	Seminars & Workshops	20		69		190		71		73
	Consultations	48		189		702		310		200
	Baseline Injuries/Illnesses	14.9	(a)	15.1	(a)	15.7	(a)	15.9	(a)	15.9 (a)
	4th Year Target	12.5	(a)	12.7	(a)	13.2	(a)	13.4	(a)	13.4 (a)
	4th Year Achievement	7.5	(a)	10.9	(a)	10.7	(a)	9.1	(a)	9.9 (a)
	Met Goal?	Yes		Yes		Yes		Yes		Yes
	a. Based on three-year rolling average									

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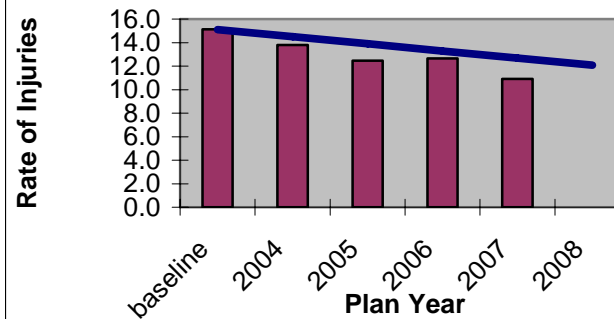
DEPARTMENT: MICHIGAN DEPARTMENT OF LABOR AND ECONOMIC GROWTH

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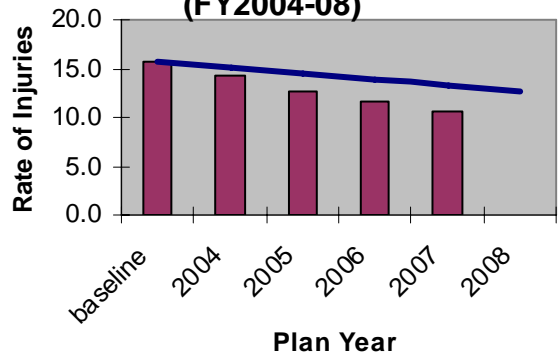
**Furniture & Fixtures SPI 1.2A
(FY2004-08)**



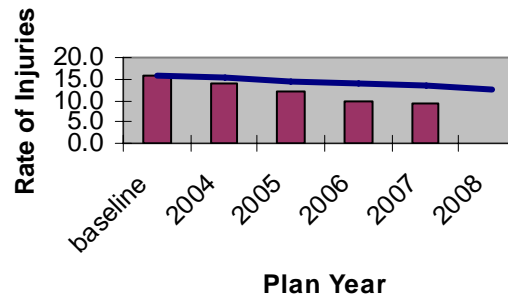
Primary metal SPI 1.2B (FY2004-08)



**Fabricated metal products SPI
1.2C
(FY2004-08)**



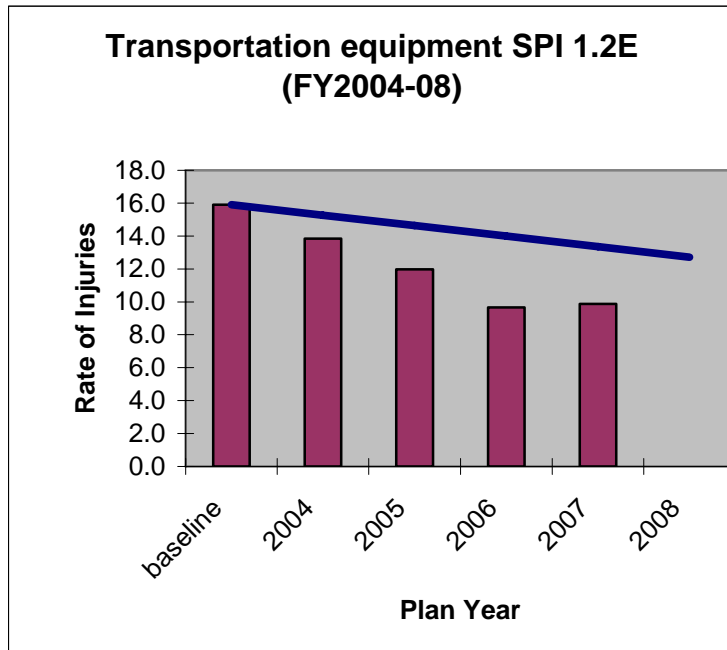
**Industrial machines &
equipment SPI 1.2D (FY2004-08)**



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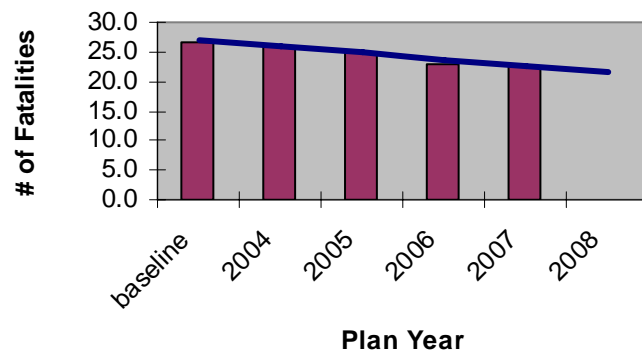
DEPARTMENT: MICHIGAN DEPARTMENT OF LABOR AND ECONOMIC GROWTH

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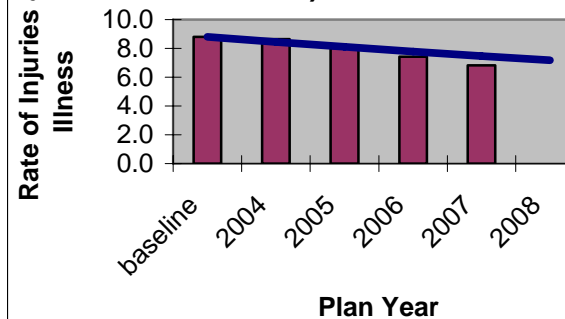
1.3 - Reduce by an additional four percent each year the number of worker injuries, illnesses (1.3B) and fatalities (1.3A) in construction by focusing attention and resources on the four leading causes of fatalities: falls, electrocutions, struck-by, crushed-by/caught between.

Highlight status  Green	Strategy 1.3 Enforcement Inspections Seminars & Workshops Consultations Baseline Fatalities/Rate 4th Year Target 4th Year Achievement Met Goal? a. Based on five-year rolling average b. Based on three-year rolling average	<table> <tr> <th></th><th>1.3A</th><th>1.3B</th></tr> <tr> <td>Enforcement Inspections</td><td>2672</td><td>2672</td></tr> <tr> <td>Seminars & Workshops</td><td>249</td><td>302</td></tr> <tr> <td>Consultations</td><td>368</td><td>432</td></tr> <tr> <td>Baseline Fatalities/Rate</td><td>27.0 (a)</td><td>8.8 (b)</td></tr> <tr> <td>4th Year Target</td><td>22.7 (a)</td><td>7.4 (b)</td></tr> <tr> <td>4th Year Achievement</td><td>22.6 (a)</td><td>6.8 (b)</td></tr> <tr> <td>Met Goal?</td><td>Yes</td><td>Yes</td></tr> </table>		1.3A	1.3B	Enforcement Inspections	2672	2672	Seminars & Workshops	249	302	Consultations	368	432	Baseline Fatalities/Rate	27.0 (a)	8.8 (b)	4th Year Target	22.7 (a)	7.4 (b)	4th Year Achievement	22.6 (a)	6.8 (b)	Met Goal?	Yes	Yes
	1.3A	1.3B																								
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4th Year Achievement	22.6 (a)	6.8 (b)																								
Met Goal?	Yes	Yes																								

**Construction Fatalities SPI 1.3A
(FY2004-08)**



**Construction Related Injuries
& Illnesses SPI 1.3B (FY2004-08)**



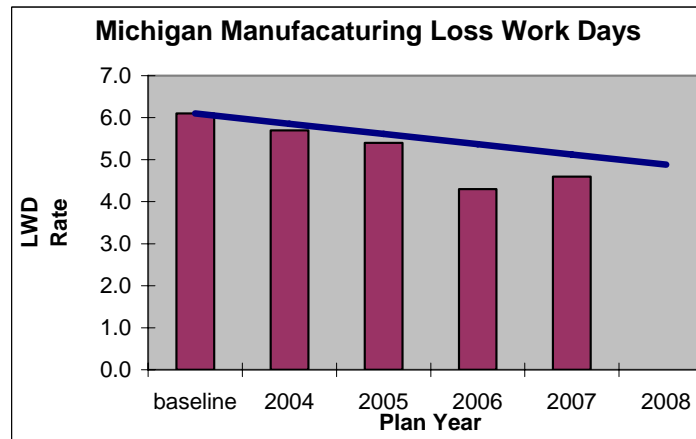
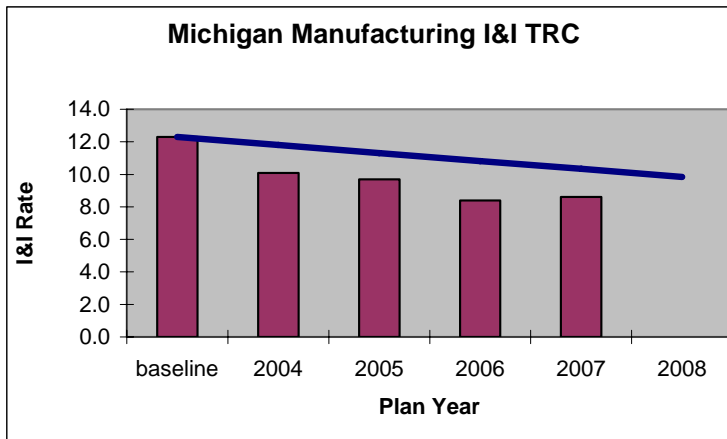
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1.4 - Reduce by an additional four percent each year the number of general industry work injuries, illnesses and fatalities in workplaces not already targeted but experiencing high injury and illness rates.

<div>Highlight status</div> <div><div></div>Green</div>	<div>Strategy</div> <div>1.4</div>				
				Michigan Manufacturing	
		1.4		TRC Rate	DART Rate
	Enforcement Inspections	463	Baseline	12.3	6.1
	Seminars & Workshops	43	4th Year Target	10.3	5.1
	Consultations	161	4th Year Achievement	8.6	4.6
			Met Goal?	Yes	Yes



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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

GOAL 2 - Promote employer and worker awareness of, commitment to, and involvement with safety and health to effect positive change in the workplace culture.

Overall Goal Status: ■ **Green** - The objective/goal will be completed by the projected date or is complete. If an objective is completed please indicate in the comments section.

- 2.1 – Promote safety and health management systems in the workplace.

<p><u>Highlight status</u></p> <p>■ Green</p>	<p><u>Strategy</u></p> <p>2.1 Fifty-percent (%) of the employers in general industry that are targeted or request a MIOSHA intervention have either a written and implemented safety and health management system or have improved their existing system.</p> <p>Comment: 645 or 1,178 compliance inspections (55%), 25 of 73 23(g) consultation (34%), 59 or 159 21(d) consultations (37%), and 70 of 170 reinspections (40%), or a total of 799 or 1,580 inspections, consultations, and reinspections (51%) had effective or improved SHMSs.</p> <p>Targeted Outreach CETD conducted 136 seminars, workshops, and training programs related to safety and health programs and performed 403 related consultations.</p> <p>MIOSHA announced a new certification program with CET cosponsors in collaboration with the MIOSHA Training Institute (MTI) at Macomb College M-TEC. Beginning October 2007, seminars offered through the MTI will provide the public an opportunity to attend a series of programs to achieve a Level One – General Safety and Health certification.</p> <p>The CET Division launched a new program called the Michigan Challenge Program, which offers high-hazard employers an opportunity to develop an effective safety and health management system while being granted a 6-month deferral from a MIOSHA programmed inspection. The deferral allows the employer time to :</p> <ul style="list-style-type: none"> • Learn about the elements of a safety and health management system • Identify strengths and weaknesses of their existing program • Review accident trends and cost estimates • Identify compliance solutions for potential hazards • Receive safety and health training
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	<p>The MCP program features an agreement signed by the Company CEO and the MIOSHA CET Division who commit to work together in the assessment, development and implementation of a safety and health system. The goal of the MCP is to help employers reduce injuries and illnesses and develop an effective safety and health system, which in turn will help positively impact the employer's bottom line.</p> <p>Met Goal? Yes</p>
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- 2.2 - Enhance awareness of safety and health in Michigan's workplaces through the provision of consultation, training and outreach services to employers and workers by implementing a targeted outreach plan for 100% of MIOSHA initiatives, e.g. standards, guidelines, emphasis programs, and promoting safety and health programs in state government.


<p><u>Highlight status</u></p> <p> Green</p>	<p><u>Strategy</u></p> <p>2.2</p> <p>Comment:</p> <p>During FY2007, MIOSHA implemented training and outreach for the following initiatives:</p> <ul style="list-style-type: none"> • Asbestos Awareness Training • Excavation and Trenching • Fleet Safety • Extreme Safety for the Younger Worker • Tree Care/Green Industry <p>CETD worked with the Michigan Department of Correction (DOC) and Natural Resources (DNR) to present three two-day training programs, which were delivered to DOC and DNR staff in FY2007.</p> <p>MIOSHA continued to work with the Office of State Employer (OSE) as part of an alliance agreement signed on March 17, 2005. The alliance covers all departments for the State of Michigan. CETD staff continues to participate on the DOC Safety and Health Advisory Committee.</p> <p>Many other state departments were visited and multiple training programs were developed and formalized specific to the departments' needs. Specific departments that received training were the Department of Management and Budget, Department of Environmental Quality, and Office of State Employer.</p> <p>Met Goal? Yes</p>
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- 2.3 Enhance recognition of effective safety and health programs in Michigan by increasing participation by three new sites in the Michigan Voluntary Protection Program and three new sites in the MSHARP Program and developing two to three alliances or partnerships to promote employee safety and health.


<p><u>Highlight status</u></p> <p> Green</p>	<p><u>Strategy</u> 2.3</p> <p><u>Comment</u></p> <p>During FY2007, MIOSHA added three employers to the MVPP program. The total number of sites remains at 24.</p> <p>In FY2007, two mentor meetings were held at a member company location on April 17 and November 11. MIOSHA used local news media and organizations' newsletters to publicize MVPP recipients. The Governor's Office and DLEG Director's Office were invited to make presentations at MVPP award ceremonies.</p> <p>Three MVPP workshops were conducted at: Michigan Safety Conference, Herman Miller, and E&E Manufacturing.</p> <p>MIOSHA added four employers to the MSHARP:</p> <ul style="list-style-type: none"> • Liqui-Force Services (USA) • Aleris International, Saginaw • Steel Industries, Inc., Plant 2, Redford • Steel Industries, Inc., Plant 4, Redford <p>Five previous MSHARP employers were re-certified. All MSHARP Awards are published in our newsletter, MIOSHA News. MIOSHA also publicizes MSHARP Awards with local news media and in organizations' newsletters.</p> <p>MIOSHA currently has 16 Alliances and five partnerships.</p> <p>Met Goal? Yes</p>
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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

- 2.4 - Implement emergency preparedness strategies and information to enable MIOSHA to assist in the event of a terrorist or other significant threat or attack by (a) providing preparedness information to employees and employers to increase workplace knowledge of and readiness for a terrorist attack or other significant threat or attack and training; and (b) equipping MIOSHA staff to provide expertise and minimize exposures to clean up and recovery personnel and facilitate providing safety and health expertise to facilitate providing support to clean up and recovery personnel.

<u>Highlight status</u>	<u>Strategy</u>
 Green	<p>2.4</p> <p>Comment: During FY2007 MIOSHA held fourteen trainings and seminars, eighteen hazard surveys were conducted, and eighty-seven consultations were conducted.</p> <p>The following activities occurred:</p> <ul style="list-style-type: none">• Relationships and communications were established with other state agencies involved in emergency preparedness, such as the Office of Public Health Preparedness of the Michigan Department of Community Health and the Emergency Management Division of the Michigan Department of State Police.• “Chemical Facility Anti-Terrorism Regulation” was published in the MIOSHA News, Vol. 11, No. 3, to inform employees and employers of the new regulation affecting chemical plants in Michigan. <p>During FY2007, thirteen staff received certificates of achievement from FEMA’s Emergency Management Institute, National Emergency Training Center, Emmitsburg, MD, for successful completion of several independent study courses. Twenty-four MIOSHA staff members participated in an avian influenza tabletop exercise staged by the MIOSHA Disaster Response team. Sixty staff received training on U.S. DHS’s Chemical Facility Anti-Terrorism Standards, and one staff member attended “Railroad Incidents for First Responders” put on by the Adrian and Blissfield Railroad Company.</p> <p>Met Goal? Yes</p>

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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

GOAL 3

Strengthen public confidence through continued excellence in the development and delivery of MIOSHA's programs and services.

Overall Goal Status: ■ **Amber** - The objective/goal will be met outside of the Action Plan's parameters.

- 3.1 - Foster program excellence and confidence through effective delivery of MIOSHA services by ensuring ninety percent (90%) of employers and workers receiving a MIOSHA intervention rate their experience as useful in identifying and correcting workplace hazards and exposures.


<p><u>Highlight status</u></p> <p>■ Green</p>	<p><u>Strategy</u></p> <p>3.1</p> <p>Comment:</p> <p>Many employers and employee representatives who received a MIOSHA intervention during the later part of FY2006 and during FY2007 received a MIOSHA Comment/Suggestion Card. They were asked to respond to the question "How would you rate your overall experience with MIOSHA?" with either a "useful" or "not useful" response. There were 1094 usable responses with 1075 responses indicating a "useful" experience, or a 98.3% positive response.</p> <p>In May 2007, the MIOSHA Comment/Suggestion Card was modified to ask more questions and give more space for written responses.</p> <ul style="list-style-type: none"> • For "How would you rate your overall experience with MIOSHA?" we have received 500 "Useful" responses and 5 "Not Useful," or a 99.0% positive response rate. • For "Did you find the staff to be knowledgeable about employee safety and health issues?" we have received 497 "Yes" and 2 "No" responses, or a 99.6% positive response rate. • For "Did the staff explain how to correct the safety and health hazards they identified?" we have received 481 "Yes" and 2 "No" responses, or a 99.6% positive response rate. <p>Additionally, we asked, "Based on the MIOSHA intervention, did you implement specific changes in your workplace?" The closing question was: "What can MIOSHA do better?"</p> <p>Of the 966 CET seminar trainees who submitted evaluations in FY2007, 955 (98.9%) indicated they were either very satisfied or satisfied. Eleven (1.1%) indicated they were not satisfied.</p> <p>Met Goal? Yes</p>
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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

- 3.2 - Respond effectively to legal mandates so that workers are provided full protection under the MIOSH Act by resolving four percent more than the previous fiscal year (60% overall) of all MIOSHA discrimination cases within 90 calendar days of receipt of complaint, and initiating investigations of program-related fatalities and catastrophes within one working day of notification for 100% of occurrences to prevent further injuries and death.


<u>Highlight status</u>	<u>Strategy</u>
 Amber	3.2 Comment: Respond effectively to legal mandates so that workers are provided full protection under the MIOSH Act by resolving four percent more than the previous fiscal year (75% overall; 72% in 2007) of all MIOSHA discrimination cases within 90 calendar days of receipt of complaint: 139 cases of which 88 cases representing 63% of the overall cases were resolved within 90 calendar days of receipt of complaint. This is a decrease from the previous report and below the goal of 75% overall because of the influx of new cases. GISHD staff has been periodically detailed to assist in the Employee Discrimination Section in an effort to achieve this goal. Initiate investigations of program-related fatalities and catastrophes within one working day of notification for 100% of occurrences to prevent further injuries and death was accomplished. Met Goals? No, for % discrimination cases, and yes, for fatality and catastrophe investigations.

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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

- 3.3 - Improve selected MIOSHA services including initiating 100% of complaint inspections within 10 workdays; reducing the backlog of standards to be revised by fourteen percent (14%), or a total of 70% over five years; and improving the quality of and access to MIOSHA publications, standards and public notices including greater availability of information on the web.

<u>Highlight status</u>  Amber	<u>Strategy</u> 3.3 <u>Comment:</u> <u>Complaints</u> Using an IMIS report, MIOSHA responded to 648 of 671 complaints in ≤10 workdays, or 96.6%; only 23 complaints were responded to in >10 workdays. That compares very favorably to the FY2005 “baseline” of 88.5% and the FY2006 achievement rate of 91.6%. Initiating 100% of complaint inspections within 10 workdays has been achieved for shorter periods of time but is proving to be impractical on an ongoing basis. <u>Standards</u> Seven new standards were promulgated/completed and four new standards were added to the list. The Standards Section continues to use the standard liaison team as consultants for standard review in order to speed up the promulgation process. <u>Website</u> CET Division is adding more information to the MIOSHA website and providing additional links and cross-links to MIOSHA, OSHA, and other websites. The web is routinely being used to post current MIOSHA activities in a timely manner such as: 2007 Take a Stand Day, alliance agreement signing, and initiative information. The website is promoted to the public through Consultation Education and Training workshops and seminars. Agency support staff promotes use of the website to the public through telephone requests for materials and services. The CET ListServ now provides monthly updates to over 1,000 subscribers. Met Goals? No, for complaints; no, for standards; and yes, for website.
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- 3.4 - Design and implement management systems and processes to met MIOSHA program data needs including implementing the information systems necessary to collect agency performance data and developing the capacity to analyze MIOSHA’s performance.

<u>Highlight status</u>  Amber	<u>Strategy</u> 3.4 <u>Comment:</u> During this year, CET continued to pursue information related to development of a CET Information System. A draft
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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

	<p>Quick Start contract was submitted to DIT in May 2007. Funding issues may further delay the implementation of the CET Information System.</p> <p>Met Goal? Not yet.</p>
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- 3.5 - Continue to implement participatory management strategies for effective communication, staff development and support, and utilization of participatory management to ensure accomplishment of MIOSHA's goals.

<p><u>Highlight status</u></p> <p> Green</p>	<p><u>Strategy</u></p> <p>3.5</p> <p>Comment: During FY2007, a number of activities were initiated or completed to implement management strategies:</p> <ul style="list-style-type: none"> • The Consultation Education and Training Division, Construction Safety & Health Division, and General Industry Safety and Health Divisions conducted problem solving sessions during staff meetings to identify and resolve organizational culture issues. • A weekly agency newsletter, MIOSHA Weekly, was published every week to inform staff of significant events and accomplishments, and to transmit less formal information throughout the agency. • An agency Consistency Committee with representatives from all agency divisions continues to review existing agency and division instructions and update them, and creates new instructions as necessary to document agency policies and procedures. Most completed instructions are added to our website as public information. • MIOSHA supervisors, managers, and directors participated in a statewide initiative, MI 360, to evaluate performance based upon feedback by direct reports, supervisors, and peers. • As part of the Connecting MIOSHA to Industry initiative, MIOSHA contracted with a training consultant for several workshops to enhance the communication skills of many MIOSHA staff (field, supervisory, and management staff of CETD, CSHD, GISHD, and Administration). • MIOSHA developed an instruction to improve coordination of consultative and enforcement activities. • MIOSHA created a Cross-Cultural Team with nine representatives from divisions to identify and work on MIOSHA cultural issues. <p>Met Goal? Yes</p>
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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

Challenges

- **Adequate Federal Funding**

- An Increase in federal funding for the MIOSHA program is needed.
- During the past seven years, funding for state plan programs for occupational safety and health have increased only about three percent, compared to increased funding of more than 15 percent for the federal OSHA program.
- The “real dollars” available to states have significantly decreased when considering inflation.
- In planning FY '08 expenditures, a shortfall of more than \$1 million was identified. A variety of cost savings measures were identified and are being implemented.
- Continued federal funding at the current level may result in reductions of programs and services.
- MIOSHA is required to maintain a program “at least as effective” as federal OSHA including staffing and activity levels which could become an issue if funding increases are not received.

- **Field Staff Training and Travel**

- To maintain staff effectiveness, ongoing in-service training and professional development is required to stay current with industry practices, equipment, and processes.
- Ongoing training and development of field staff is required and expected by federal OSHA to maintain “at least as effective as” status.
- MIOSHA must ensure that staff is adequately trained on new rules, standards, and agency policy.
- Consistency among standard interpretations and program operations is a primary concern of MIOSHA customers.
- Current limitations challenge the agency to seek less costly alternatives for providing training including bringing OSHA Institute courses to Michigan, teleconferencing, video conferencing, and using internal resources to prepare and conduct training.
- MIOSHA staff continues to require training provided through the OSHA Institute and other out-of-state locations for some specific courses due to the complexity of the rules and the equipment/facilities required for the training.

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APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

- **Data Collection System for Consultation Program Activities**
 - MIOSHA needs an automated data management system to track and report on CET's traditional program activities.
 - Lack of a data management system requires time intensive manual tracking logs, hand counts, and create an inability to effectively monitor and evaluate program activities.
 - MIOSHA is required to report quarterly and annually to federal OSHA on program activities in support of Strategic Plan goals. This requirement is not fully met as a result of not having the ability to collect, track, and report program activities and results.
- **Internal Culture and Communication**
 - MIOSHA has an ongoing initiative, "Connecting MIOSHA to Industry," to promote proactive attention to workplace safety and health hazards and ensure that every MIOSHA intervention is educational.
 - MIOSHA consists of five major divisions with distinct cultures and practices.
 - To ensure cooperation and mutual support, MIOSHA must ensure that information about programs, services, and priorities of each division is shared and understood throughout the program.
 - Because staff is disbursed throughout the state, MIOSHA must ensure communication strategies are implemented that are collaborative and inclusive.
- **Web-based Materials and Training**
 - Employers and workers more frequently look to the web for training materials and programs.
 - MIOSHA's budget constraints require the agency to look for more cost-effective ways to provide training materials and information.
 - The CET division is reformatting materials including pamphlets, booklets, posters, and cards for easy access, loading, and printing.
 - Training programs are also needed for the web-site. These programs often include video clips.
 - Interactive training is also highly desirable.
 - Current size limitations of the web page prohibit developing and posting these kinds of programs.

FY2007 Annual Program Performance Measures

DEPARTMENT: MICHIGAN DEPARTMENT OF LABOR AND ECONOMIC GROWTH

APPROPRIATION UNIT: Michigan Occupational Safety & Health Administration (MIOSHA)

- **Marketing MIOSHA Programs and Services**

- Small employers and new businesses often do not know about or understand their obligations under the MIOASH Act.
- MIOSHA implements strategies and initiatives that small, new, industries experiencing higher rates of worker injuries and fatalities, and employers who have not used MIOSHA programs and services.
- Improved methods to identify employers to include in outreach activities are needed to effectively reach target audiences.

- **Succession Planning**

- MIOSHA has the potential to lose approximately one-half of its staff to retirements in the next five years.
- Many supervisors, managers, and administrators are among those who are or will become eligible.
- MIOSHA must create opportunities for mentoring, coaching, and staff development to ensure that institutional knowledge and understanding of program functioning is not lost.
- MIOSHA must ensure that program policies and procedures are created in writing and kept updated.

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